



Code of Ethics_IMI Fabi

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1. AREAS OF APPLICATION

- This Code applies to the IMI Fabi Group and more precisely to the members of the Management, the employees and any person or entity connected with the Group.
- The Group acts according to the principles of this Code and its aim is that of pursuing a highly satisfactory level of performance for its stakeholders. This is obtained also through the continuous research into quality and growth through technologies that respect the environment and take into account the vital aspect of safety all in a greater context of reducing the risks for the social environment .
- Consequently the Group is committed to observing the principles of the Code as regards both relations within the Group itself as well as with external parties contacted whilst pursuing its objectives , such as: subsidiaries or related companies, commercial partners, customers and suppliers.
- For this purpose the Group makes this Code public by publishing it on its website (www.imifabi.com) as well as by implementing its principles with its stakeholders.
- The Code, which may be revised and modified, integrates and consolidates the Internal Organization Model of IMI Fabi SpA adopted as per Legislative Decree no 231/2001 regarding the prevention of criminal offences therein treated.
- In the event of non compliance with the Code of Ethics which may result in a breakdown of the trust established with the party concerned, disciplinary measures may be taken which could include legal action.



The IMI Fabi Group is comprised of the following companies:

EMEA / EUROPE

IMI FABI SPA | POSTALESIO (SO), ITALY
IMI FABI SARDEGNA SRL | ORANI (N U), ITALY
IMI FABI BELGIUM | UIKHOVEN, BELGIUM

NCSA / AMERICAS

IMI FABI LLC | BENWOOD WV, USA
IMI FABI BRASIL | BRUMADO, BA, BRAZIL
IMI FABI BRASIL | SALES AND MARKETING OFFICE, SÃO PAULO, BRAZI

JAPAC / ASIA PACIFIC

AIHAI IMI MINERALS CO. LTD | HAICHENG, CHINA
IMI FABI ASIA | SALES AND MARKETING OFFICE, SINGAPORE
IMI FABI AUSTRALIA PTY. LTD | MOUNT SEABROOK, AUSTRALIA
IMI OMAR PTV. LTD | KARACHI, PAKISTAN

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2. RELATIONSHIP WITH STAKEHOLDERS

- Compliance with the demands made by the stakeholders of the Group implies ongoing discussion with employees, customers, suppliers, associations, the authorities and citizens.
- In its relationship with external parties the Group will act in accordance with the principles of legitimacy, loyalty, transparency and independence. Consequently all the recipients of the Code shall be required to respect the law, the rules and the company procedures. In their relations with external parties they shall act correctly and shall avoid the disclosure of false information; they will not carry out any activity on their own initiative or on behalf of anyone using their position within the Group; they will fully respect the company's integrity and transparency rules.
- Gifts and hospitality are only allowed if of minor value and within the normal acceptable parameters of corporate courtesy. Any behavior/act that will bring personal advantage or that will influence the external party's/the Unions'/ the public administration's decisions to his/her personal advantage is strictly prohibited.
- The Company is committed to maintaining strict control over any behaviour tending towards corruption, fraud, money laundering, anti-competitive practices and trade descriptions, reporting any illicit behaviour to the Authorities.

3. DATA PROTECTION AND CONFIDENTIAL INFORMATION

- The law governing the security and confidentiality of personal data is applicable at all times and, in addition , all those covered by this code are to ensure that any information concerning the company will be transmitted only in the interests of the company itself and for purposes related to its activity.
- No improper use will be allowed.
- The Company thus ensures the protection of all personal or sensitive data belonging to employees, suppliers and clients, avoiding any unauthorised disclosure.

4. HUMAN RESOURCES

- The Group ensures that all its staff, internal and external, are professionally qualified to do the job they have been employed for. The Company, for its part, will provide specific training courses aimed at improving their employees' professional development.
- Employees, at all levels, are required to be respectful and to act accordingly in order to ensure that the dignity, honour and good reputation of everybody is respected. No insulting or offensive behaviour that could undermine a harmonious working environment will be tolerated.
- In particular, the Group does not tolerate racial, religious, or political discrimination; it shall pursue the gender equality at work, condemning any kind of harassment; it shall promote equal pay.
- The Group therefore condemns any behaviour such as mobbing and/or stalking of its employees and collaborators. This includes for example, but not exclusively any behaviour aimed deliberately at obtaining favours or establishing non-consensual or inappropriate interpersonal relationships

5. PROPER USE OF COMPANY EQUIPMENT

- All employees are requested to safeguard the integrity of Company equipment through responsible behavior and to use company appliances appropriately and for the intended use.
- When using Company equipment ,the reputation and image of the Group must be safeguarded at all times.



6. HEALTH AND SAFETY

- Safety is of paramount importance for the Group as it affects both employees and stakeholders
- Worker's health and hygiene in the workplace are constantly checked through regular health surveillance of those workers who are most exposed to risk. This is carried out through programs of preventive medicine, and constant checks as to the suitability of the workers performing the duties (both of newly hired personnel as well as of any worker who changes his position within the company) .
- Particular attention is given when selecting new products which must be safe for their users.
- As laid down by Law no. 3 dd 16 January 2003 smoking on the Company premises is forbidden and in accordance with Law no 125 dd 30 March 2001 and Rule D.L. 16 March 2006 drinking alcohol on the Company premises is also forbidden
- Law D.L. 30 October 2007 (art 8, par. 6 Law dd 5 June 2003 no 131 as well as regulation D.L.18 Sept 2009) states categorically that the use of drugs on Company premises is forbidden
- With reference to the above, the Group will not tolerate any use of recreational drugs or alcohol , even outside working hours, except in quantities below the legal limit for driving vehicles
- Imi Fabi considers unacceptable any form of child labour and forced labour even in those countries where it is not considered a crime and the Company is committed to abiding by national and international law in this field. The Group shall promote periodical checks on its foreign suppliers to ascertain that the above criteria are respected and is committed to increasing awareness of these issues in its suppliers.

7. COMPANY MANAGEMENT

- The Group is very sensitive to sustainable development and considers among its main goals research and development aimed at improving production processes that respect the environment and is thus in the common interest of the stakeholders.
- The Group also promotes research and development activities in order to monitor the evolution of those technologies which mostly respect the environment and to this end it is constantly analyzing the production processes with the aim of optimizing its technical-economic management.
- The Group follows sustainable procurement policies, giving priority to the suppliers using renewable energies and recycled raw materials, assuring responsible managing of energy and raw materials.
- The Group verifies the results of its commitment through Quality, Environment and Security Certification.
- The strict criteria of Corporate Social Responsibility that IMI Fabi pursues are also required of its suppliers of products, materials and services; IMI Fabi shall verify their implementation through periodical audits.

8. INTERNAL CONTROL SYSTEM

- The Group considers the internal control system a key element to the governance and the correct management of the Company. It also considers the internal control system an important tool for protecting the ethical principles of this code.
- The System is a process which involves, in different ways, the administrative departments, the Board of Auditors and all the employees: they should all abide by the rules of the internal control system which has been approved by the Board of Directors of the parent company.

9. VALUE OF THE CODE OF ETHICS

- Whilst reserving the right to pursue legal action with regard to any damage caused by the violation of the Code or failure to respect its rules, failure to comply will result in
 - a) disciplinary measures for its employees in accordance with contractual obligations
 - b) for contractors and consultants the measures taken will be laid down in their relative contracts.
- As regards the Management, the Board of Directors will decide which measures to adopt depending on the scope of the infringement.